

BEFORE
THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA
DOCKET NO. 2017-207-E

IN RE: Friends of the Earth and Sierra Club,
Complainant/Petitioner v. South Carolina
Electric & Gas Company,
Defendant/Respondent

**CENTRAL ELECTRIC POWER
COOPERATIVE, INC.'S FIRST
AND CONTINUING REQUEST
FOR PRODUCTION OF
DOCUMENTS**

**TO: K. CHAD BURGESS, ESQ., AND MATTHEW W. GISSENDANNER, ESQ.,
REPRESENTATIVES FOR SOUTH CAROLINA ELECTRIC & GAS COMPANY:**

Central Electric Power Cooperative, Inc. and The Electric Cooperatives of South Carolina, Inc. (collectively, the “Cooperatives”), as intervenors and parties of record in the above-captioned action pursuant to South Carolina Public Service Commission (“Commission”) Rules 103-804.H, 103-804.L and 103-825, hereby request, pursuant to Commission Rule 103-833.B, that South Carolina Electric & Gas Company (“SCE&G”) respond to the following Requests for Production under oath and to serve the responses to these requests within twenty (20) days following service of same.

DEFINITIONS AND INSTRUCTIONS

A. “You” and “your” includes South Carolina Electric & Gas Company and any of its representatives, owners, employees, members, attorneys, or agents.

B. If any privilege is claimed with respect to any requested item, the identification of which would otherwise be required by these requests, you need not produce or disclose the contents

thereof at this time, but with respect to each document and oral communication for which a privilege is claimed, you shall:

- 1) identify the date thereof;
- 2) state the particular privilege believed applicable and concisely state sufficient facts to support the claim of privilege; and
- 3) if the privilege is asserted with respect to a document, identify all persons to whom its contents were disclosed, including all recipients thereof.

REQUESTS

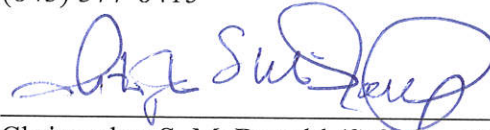
Please produce copies of all discovery received in Docket No. 2017-207-E from other parties and the responses and documents provided in response. To the extent those documents have been made previously available or are otherwise available in electronic format, the Cooperatives would prefer to receive electronic access to such documents (for example, previously docket filings reference a data room set up by SCE&G in response to discovery requests by Complainant/Petitioner Friends of the Earth).

These Requests shall be deemed to continue from the time of service until the time of final disposition of this matter by the Commission so that information sought, which comes to the knowledge of a party, or its attorney, after original Responses to these Requests have been submitted, shall be promptly supplemented.

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By:



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Cooperative, Inc. and The Electric Cooperatives of
South Carolina, Inc.

March 15, 2018
Daniel Island, South Carolina